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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Sean Thomas Jeffries,  
Plaintiff,  
vs.  
Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

} Case No. 1:23-cv-00955-GSA  
} STIPULATION AND ORDER FOR  
} EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from September 25, 2023 to November 24, 2023, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT . All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of September 25, 2023 and October 2, 2023,  
2 Counsel currently has 10 merit briefs and 6 reply briefs. Counsel requires  
3 additional time to brief the issues thoroughly for the Court's consideration.  
4 Defendant does not oppose the requested extension. Counsel apologizes to the  
5 Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: September 22, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: September 22, 2023

PHILLIP A. TALBERT  
United States Attorney  
MATTHEW W. PILE  
Associate General Counsel  
Office of Program Litigation  
Social Security Administration

By: \*s/ Oscar Gonzalez de Llano  
Oscar Gonzalez de Llano  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on September 21, 2023)

1 IT IS SO ORDERED.  
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Dated: September 22, 2023

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE